

Theodore Robert Bundy  
Box 249  
Glenwood Springs, Colorado 81601

August 23, 1977

Milton K. Blakey  
Special Prosecutor  
20 East Vermijo - Suite 310  
Colorado Springs, Colorado

Re: Hair Specimen Examination

Dear Mr. Blakey:

Due to your concern regarding the chain of custody of known and questioned hair samples involved in this case, you have expressed to the Court and to me your reluctance to release this evidence to the unsupervised control of Charles V. Morton, an expert in the field of hair comparison appointed by the Court to assist me in my defense. In addition, the Court's order of May 31, 1977, (nun pro tunc May 23, 1977), directs the People and myself to resolve by stipulation the manner and time schedule for making the hair specimens available to Mr. Morton.

As I told you on May 24, 1977, at our discovery conference, I believe it is preferable for a representative of your office to be present during examinations of the hair by Mr. Morton. However, I also believe that the costs of such a precaution will be rather high considering the travel expenses and time involved. This is entirely your concern I suppose. The complication we have here is this: Mr. Morton will need to make a preliminary examination of the hair before he can determine what, if any, additional examination should be undertaken. Should he recommend additional studies, then your representative would have to make at least two trips to the Oakland, California, area. Again, I suggest you consider the costs. While I am not

above, then such specimens should also be delivered to Mr. Morton.

Please let me hear from you on this matter before September 1, 1977. Since additional examinations could be time-



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Re: People v. Bundy - Suppression Hearing Witnesses

Dear Mr. Blakey:

On July 14, 1977, during a meeting we had in the Pitkin County Sheriff's Office and again in a phone call I made to you on August 3, 1977, I asked you for the names of the witnesses you intended to call at the suppression hearing which was then scheduled for August 23, 24, and 25, 1977. Your response to both my requests was a very general one. You simply referred me to any name of any person who appears in any of the discovery material given to me. The names of several hundred people appear in those reports, and I honestly do not believe that you consider them all "prosepective" suppression hearing witnesses.

As you are aware, Rule 16(a)(1) Crim. P. provides that the prosecutor shall disclose to the defense upon request the names and addresses of all persons whom the district attorney intends to call at hearing or trial, together with their relevant written, recorded, or oral statements. My Motion for Discovery, filed on April 25, 1977, and heard by Judge Lohr on May 9, makes such a request on page one of the motion. Furthermore, the Court's Discovery Order of May 15, 1977, directs your office to disclose the names, addresses and statements of witnesses you intend to call at hearing or trial. I do not



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believe it was the intention of the discovery rules, or the Court, or myself, for that matter, that a request for information concerning witnesses you intend to call to the suppression hearing be complied with only with a general referral to any name of any person the defense might have in its files. I think a very specific response is in order.

Enclosed you will find a copy of the only endorsed list of witnesses I have. I received this list in November of 1976, and have not been given another one since. I have also enclosed a letter and list of witnesses of March 18, 1977, which you sent to Charles Liedner. These are witnesses you intended to call at the preliminary hearing. However, it does not comply with the rule or the Court's order because no addresses are included. I expect the same courtesy you showed Mr. Liedner in this matter, especially because it is required by law and because I have given you notice of all the witnesses I intend to call.

Please consider this letter as another request for the names, addresses and statements of witnesses you intend to call at the suppression hearing now scheduled for September 20, 1977. I will object to the testimony of any witness whose name, address and relevant statements have not been supplied to me reasonably in advance of the suppression hearing.

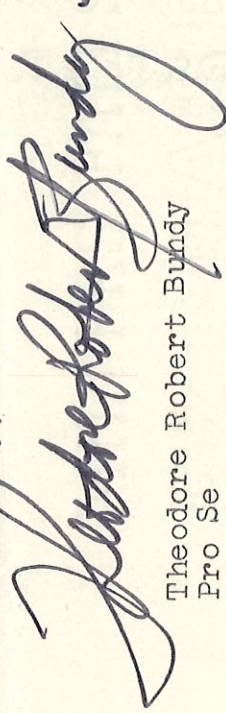
Also with regard to Rule 16(a)(1) and the Court's Discovery Order of May 15, you are required to disclose to me all books, paper, documents, photographs, and tangibles which you intend to use in the suppression hearing, and which were obtained from or belonged to the defendant. Thus far you have indicated to me your intention to use a road map of Colorado, a ski brochure, and a crow bar. An attempt to introduce at the suppression hearing anything obtained from me which I have not been given notice of will be objected to. Please let me know



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the identity of any tangibles you intend to use at the suppression hearing which once belonged to me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Theodore Robert Bundy". The signature is written in a cursive, flowing style with a large, prominent initial "T".

Theodore Robert Bundy  
Pro Se

cc: Judge George Lohr  
Kenneth Dresner

Enclosures (2)